

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

DONATO APONTE NAVEDO, BELKIS
ISABEL SANTIAGO MARTÍNEZ, AND
THEIR COMMUNITY OF ASSETS AND
GAINS,

Apontes,

v.

NALCO CHEMICAL COMPANY, JOSÉ
SERRANO AND HIS WIFE JANE DOE (1),
AND THEIR COMMUNITY OF ASSETS
AND GAINS, JORGE CASTILLO AND HIS
WIFE JANE DOE (2), AND THEIR
COMMUNITY OF ASSETS AND GAINS,
ASHOK PAUL DUGGAL AND HIS WIFE
JANE DOE (3), AND THEIR COMMUNITY
OF ASSETS AND GAINS AND ABC
INSURANCE,

Defendants.

Case No. 09-cv-01232-JA

Magistrate Judge Marcos E. López

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Defendants Nalco Company (“Nalco”) and Ashok Paul Duggal (“Duggal”) (collectively “Defendants”), by and through their attorneys, and pursuant to Federal Rule of Civil Procedure 56 and Local Rule 56, file their Motion For Summary Judgment (“Motion”). For the reasons set forth in their Memorandum In Support Of Their Motion For Summary Judgment, Defendants respectfully requests that the Court grant their Motion, award summary judgment in Defendants’ favor, and dismiss Plaintiff’s claims with prejudice.

DATED: June 21, 2011

Respectfully submitted,
NALCO COMPANY, ASHOK DUGGAL

By: s/ Natascha B. Riesco
One of Their Attorneys

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CERTIFICATE OF SERVICE

The undersigned attorney certifies that he caused a true and correct copy of the foregoing **DEFENDANTS' MOTION FOR SUMMARY JUDGMENT** to be served upon the following attorneys via the CM/ECF filing system on this 21st day of June, 2011.

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